

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:21-CR-00563-MTS-NCC
)	
CHRISTILE HUGHES-DILLON,)	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Geoffrey S. Ogden, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with:
 - (a) an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), specifically conspiracy to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a).
2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States

Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. In the event Defendant somehow provided some evidence to overcome this presumption of detention, the facts and circumstances of this investigation lead to the conclusion that Defendant's pre-trial release would create a substantial risk to the safety of the community, as well as a potential flight risk.

4. Defendant's charges stem from an ATF investigation that began in roughly November 2020, which concerned substantial drug trafficking activity and firearms-related violence taking place in the Castle Pointe neighborhood of St. Louis County, as well as surrounding areas. The investigative team identified the HUGHES Drug Trafficking Organization (DTO), which included numerous members of the HUGHES family, including but not limited to David HUGHES, Otis HUGHES, Curtis HUGHES, Howard HUGHES, co-Defendant Tajuan WILSON, and the Defendant Christile HUGHES-DILLON. The HUGHES DTO also included many non-member associates living and operating in the Castle Pointe Neighborhood and elsewhere, including co-Defendant Lorenzo SMITH, constituting an insular community. This investigation included substantial physical surveillance, the use of pole cameras, the use of precision location information warrants, the use of GPS tracker warrants, and the use of confidential informants to conduct controlled purchases of narcotics from various member of the DTO. Moreover, the investigation lead to the use of judicially authorized wire and electronic monitoring (wiretaps).

5. The investigation revealed a substantial drug trafficking operation, where the HUGHES DTO was selling large quantities of "crack" cocaine base, as well as fentanyl.

Moreover, the investigation revealed that members of the DTO, including Defendant, regularly carried, distributed, and sold firearms in furtherance of their drug trafficking enterprise.

6. As an initial matter, there is a serious risk that the defendant will flee.

Throughout this investigation, Defendant has shown a consistent propensity to flee from law enforcement. This includes taking off at high rates of speed in a motor vehicle when law enforcement would attempt to conduct a traffic stop based on intercepted wire communications involving Defendant that indicated drug trafficking, firearms transfers, and/or imminent violent acts. Not only does this conduct indicate that Defendant is a flight risk, but it also indicates the danger he represents to the community by accelerating at high rates of speed in attempts to avoid apprehension.

7. The danger Defendant represents to the community, though, is more precisely demonstrated as a result of not only his criminal history (to include convictions and arrests), but as a result of his conduct as observed over the intercepted communications, as well as physical surveillance.

8. First and foremost, Defendant is a documented member of the “Bottom Boyz,” a notorious and violent St. Louis-based street gang. Additionally, investigators have utilized numerous confidential sources of information throughout this investigation, both proactively and as a means of gathering intelligence of the HUGHES DTO and its members, to include Christile HUGHES-DILLON. One confidential source revealed that he/she has witnessed a shooting between the Defendant and another St. Louis-based street gang. That same source has observed the Defendant walk around the Castle Pointe neighborhood and randomly shoot firearms. Prior to the interception of wire communications in this investigation, this same source reported observing the Defendant obtain numerous narcotics packages from other members of the

HUGHES DTO, to include Defendant's father, Otis HUGHES.

9. The Defendant has been intercepted over the Title III wire openly discussing possession and use of firearms, as well as transferring firearms to other members of the DTO. This has taken place on numerous occasions. One instance, which led to the underlying felon in possession charge, took place as a result of Defendant being intercepted discussing there firearms in a closet to another member of his family, and requesting that individual bring one of the firearms to the Defendant. This individual was subsequently arrested in route to Defendant, and she was found in possession of the firearm in question.

10. Based on the intercepted communications, many of which are included in this affidavit, HUGHES-DILLON has been involved in discussions of committing armed robbery, as well as discussions pertaining to the use of firearms and other means of violence against various individuals. This includes a September 9, 2021 incident in which co-defendant Lorenzo SMITH called an associate and told him to hurry up and meet him so they could conduct an armed robbery on an individual selling drugs. SMITH also discussed the matter with HUGHES-DILLON, who was in the process of looking for said individual. Moreover, that same day, SMITH was involved in an armed robbery of a victim at a convenience store in Ferguson, Missouri.

11. On October 14, 2021, law enforcement executed approximately 14 search warrants, including 10 search warrants on various residences and businesses utilized by the HUGHES DTO. This includes Defendant's address. Investigators seized, among other items, approximately 1 kilogram of crack cocaine base and 1 kilogram of cocaine from the Tajuan WILSON's residence, who is the primary source of supply for the HUGHES DTO. Investigators seized approximately 7-8 firearms, including at least one firearm from the residence utilized by

HUGHES-DILLON.

12. The danger Defendant represents to the community is apparent from the facts revealed throughout this investigation, but is compounded when considering his criminal history. A review of one criminal history database revealed Defendant's criminal history includes Tampering 1st degree (felony) and Resisting Arrest/Detention/Stop with Risk of Death/Injury (felony) on March 13, 2020, and Resisting Arrest/Detention/Stop with Risk of Death/Injury (felony). He has numerous arrests for violent and/or firearm offenses, including Armed Criminal Action, Unlawful Use of a Weapon (including shooting from a motor vehicle), and Robbery 1st Degree, Assault 1st Degree.

13. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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